

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE NO.**

SAMUEL ZEAN,
Plaintiff,

Judge
Magistrate Judge

vs.

COMCAST BROADBAND
SECURITY, LLC d/b/a Comcast
d/b/a Xfinity; SOUTHWEST
CREDIT SYSTEMS L.P.; and
TRANS UNION, LLC,
Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, on the following grounds:

1. Plaintiff Samuel Zean served Trans Union on or about October 26, 2017 with a Summons and Complaint to be filed in the 4th Judicial District Court, Hennepin County, Minnesota. Copies of the Summons and Complaint are respectively attached hereto, redacted pursuant to Federal Rule of Civil Procedure 5.2, as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Attached hereto as **Exhibit C** is a copy of Trans Union, LLC's Notice of Filing Notice Of Removal With The United States District Court to be filed in Hennepin County District Court.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 109 - 136.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court for the District of Minnesota.

6. As of the date of this Notice Of Removal, Defendants Southwest Credit Systems, L.P. ("Southwest") and Comcast Broadband Security, LLC d/b/a Comcast d/b/a Xfinity ("Comcast")—the only other named Defendants in this action—have been served. Counsel for Trans Union has contacted counsel for Southwest and Comcast, through their authorized representatives, and they have consented to this removal as evidenced by the consents attached hereto as **Exhibit D** and **Exhibit E**.

7. Notice of this removal will promptly be filed with the 4th Judicial District Court, Hennepin County, Minnesota and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota to this United States District Court, District of Minnesota.

Respectfully submitted,

/s/ Bradley D. Fisher

Bradley D. Fisher, Esq. (219356)

Amy M. Sieben, Esq. (326021)

Fisher Bren & Sheridan, LLP

920 Second Avenue South, Suite 975

Minneapolis, MN 55402-4011

Office: (612) 332-0100

Direct: (612) 902-2750

Fax: (612) 332-9951

E-Mail: bfisher@fisherbren.com

asieben@fisherbren.com

Counsel for Defendant Trans Union, LLC